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Attorneys for Plaintiffs
MICHAEL EGAN and
BRIAN EGAN, a Minor,
By and through his
Guardian Ad Litem
MICHAEL EGAN

FILED
DISTRICT COURT OF GUAM

MAY 10 2002

MARY L. MOON
CLERK OF COURT

4

IN THE U.S. DISTRICT COURT
OF GUAM

MICHAEL EGAN and BRIAN EGAN, a
Minor, by and through His Guardian
Ad Litem MICHAEL EGAN

CIVIL CASE NO. 02-00007

Plaintiff,

DISCOVERY PLAN

vs.

UNITED STATES OF AMERICA,

Defendant.

DISCOVERY PLAN

Pursuant to Rule 26 (f) of the Federal Rules of Civil Procedure and Local Rules
16.2, the parties agree to and hereby submit the following plan:

A. Depositions of fact witnesses may begin at once and be taken as needed,
prior to the discovery cutoff date. Some of the parties may call expert witnesses in this
case.

B. Unless additional discovery is ordered by the Court, the parties also may
propound one set each of interrogatories (25 maximum) and requests for admissions

ORIGINAL

(25 maximum). Requests for production may also be propounded. This discovery shall be served in such a fashion as to be subject to answer or response on or before the discovery cutoff date.

C. The parties, except as otherwise noted, agree to provide all prediscovery and preliminary discovery mandated by local rules and FRCP Rule 26 by June 15, 2002. Compliance with mandatory disclosure as is set forth in Rule 26 (a) (1) is on-going.

D. All parties will exchange names and reports (if any) of expert witnesses on or before July 5, 2002.

E. The specific subjects on which discovery may be needed are:
Facts supporting the nature of the claims and defenses.

F. Other than the provisos set forth above in Item B, the parties do not anticipate requiring any other changes or limitations on discovery as imposed under the federal and local rules.

G. The Cutoff date for discovery is August 9, 2002.

APPROVED AS TO FORM AND CONTENT:

Dated: May 10, 2002.

Frederick A. Black, Esq.
UNITED STATES ATTORNEY

BY: _____

MIKEL W. SCHWAB, ESQ.
Assistant U.S. Attorney
Attorneys for Defendant
UNITED STATES OF AMERICA

Dated: May 10, 2002.

GORMAN & GAVRAS

BY: 

WILLIAM L. GAVRAS, ESQ.

Attorneys for Plaintiffs

MICHAEL EGAN AND BRIAN EGAN, a
Minor, by and through his Guardian Ad
Litem MICHAEL EGAN